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March 4, 2022
Hon. Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/4/2022

Re: *Kerri Flowers v. Hartford Life and Accident Insurance Company*
Case No.: 1:21-cv-05388 (MKV)

Dear Judge Vyskocil:

We represent Defendant Hartford Life and Accident Insurance Company (“Hartford”) in the above-referenced matter. This matter involves Plaintiff’s claim for long-term disability (“LTD”) benefits under an employee welfare benefit plan governed by the Employee Retirement Income Security Act of 1974, as amended, 29 U.S.C. §1001, *et seq.* (“ERISA”). Pursuant to the briefing schedule set by the Court, parties’ cross-motions for summary judgment are due on March 7, 2022. In connection with the filing of its cross-motion for summary judgment, Hartford intends to file the ERISA administrative record pertaining to Plaintiff’s LTD claim at issue. The administrative record contains Plaintiff’s Protected Health Information (“PHI”), including medical records. Due to Plaintiff’s privacy concerns with respect to her PHI, she objects to the public disclosure of the ERISA administrative record.

In light of Plaintiff’s privacy concerns, the parties jointly request that Hartford be permitted to file the ERISA administrative record on ECF under seal.

Respectfully submitted,

s/ Michael H. Bernstein
Michael H. Bernstein
ROBINSON & COLE LLP
Counsel for Defendant

s/Hudson T. Ellis
Hudson T. Ellis
ERIC BUCHANAN & ASSOCIATES, PLLC
Counsel for Plaintiff

Granted. SO ORDERED.

Date: 3/4/2022
New York, New York

Mary Kay Vyskocil
United States District Judge